

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA**

In re:	§	
	§	Chapter 7
	§	Case No. 24-30167
Pro-Mark Services, Inc.,	§	
	§	
Debtor.	§	
<hr style="width: 50%; margin-left: 0;"/>		
	§	Adv. No. 24-07014
ERIK A. AHLGREN, as Chapter 7	§	
trustee of Bankruptcy Estate of Pro-	§	
Mark Services, Inc., as Administrator of	§	
the Pro-Mark Services, Inc. Employee	§	
Stock Ownership Plan, and as Trustee of	§	
the Pro-Mark Services, Inc. Employee	§	
Stock Ownership Trust,	§	
	§	
Plaintiff,	§	
	§	
	§	
v.	§	
	§	
CONNIE BERG, KYLE BERG, CONNIE	§	
BERG REVOCABLE LIVING TRUST,	§	
KYLE R. BERG REVOCABLE LIVING	§	
TRUST, CHAD DUBOIS, MANDY	§	
GRANT, and MIGUEL PAREDES,	§	
	§	
Defendants.	§	

**BERG DEFENDANTS' NOTICE OF MOTION FOR  
WITHDRAWAL OF REFERENCE OF ADVERSARY PROCEEDING**

NOTICE IS HEREBY GIVEN that on this date Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, and Kyle R. Berg Revocable Living Trust (collectively, the "Berg Defendants") filed the annexed Motion for Withdrawal of Reference of Adversary Proceeding (the "Motion").

NOTICE IS FURTHER GIVEN that unless a party in interest files an objection in writing to the relief requested in the Motion on or before July 2, 2025, which is fourteen (14) days from the date of service of this Notice, the Court may thereafter and without further notice enter an order granting the relief requested in the Motion.

NOTICE IS FURTHER GIVEN that written objections to the Motion, if any, shall be filed with the Clerk of the United States Bankruptcy Court, whose address is 655 First Avenue North, Suite 210, Fargo, ND 58102, with a copy mailed to counsel for the Berg Defendants, whose name and address is listed below.

RESPECTFULLY SUBMITTED this 18th day of June 2025

**HAYNES AND BOONE, LLP**

/s/ Stephen M. Pezanosky

Stephen M. Pezanosky (*admitted pro hac vice*)

Stephen.Pezanosky@haynesboone.com

Aimee M. Furness (*admitted pro hac vice*)

Aimee.Furness@haynesboone.com

Jordan E. Chavez (*admitted pro hac vice*)

Jordan.Chavez@haynesboone.com

Brenna H. Scully (*admitted pro hac vice*)

Brenna.Scully@haynesboone.com

**Haynes and Boone LLP**

2801 N. Harwood St., Suite 2300

Dallas, Texas 75201

Telephone: (214) 651-5000

Facsimile: (214) 651-5940

*Attorneys for Defendants Connie Berg, Kyle Berg,  
Connie Berg Revocable Living Trust, Kyle R. Berg  
Revocable Living Trust*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 18th day of June 2025, the above document was served on all counsel of record via CM/ECF, including the Trustee and his counsel.

/s/ Stephen M. Pezanosky  
Stephen M. Pezanosky